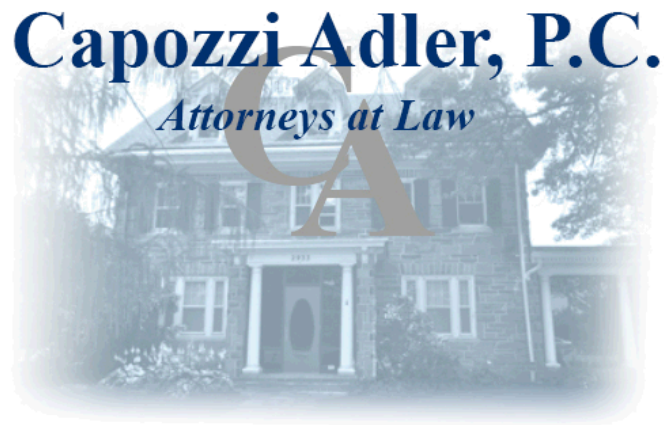


Louis J. Capozzi, Jr., Esquire\*  
Daniel K. Natirboff, Esquire  
Donald R. Reavey, Esquire  
Craig I. Adler, Esquire\*\*  
Andrew R. Eisemann, Esquire  
Glenn A. Parno, Esquire\*\*  
Bruce G. Baron, Esquire  
Brandon S. Williams, Esquire  
Nicholas J. Luciano, Esquire  
Timothy Ziegler, Sr. Reimb. Analyst  
Erin E. Anthony Reimb. Analyst  
Karen L. Fisher, Paralegal  
Lisa B. Hummel, Paralegal  
Linda Gussler, Paralegal  
\*(Licensed in PA, NJ and MD)  
\*\*(Licensed in PA and NJ)



1200 Camp Hill Bypass  
Camp Hill, PA 17011

Mailing Address: P.O. Box 5866  
Harrisburg, PA 17110

Telephone: (717) 233-4101  
Facsimile: (717) 233-4103  
[www.capozziadler.com](http://www.capozziadler.com)

Mid-Penn Abstract Company  
Charter Settlement Company  
Telephone: (717) 234-3289  
Facsimile: (717) 234-1670

January 24, 2016

Regional Director  
National Labor Relation Board – Region 4  
Philadelphia, PA (by E-FILE and E-Mail)

RE: REQUEST FOR CONTINUANCE OF HEARING DUE TO  
UNPRECEDENTED WEATHER CONDITIONS  
Ivy Hill Rehabilitation and Nursing Center – 04-RC-167699  
Our Matter No. 119-16

Dear Regional Director:

The Hearing in this matter is scheduled for Monday, January 25, 2016, beginning at 10 a.m. I am requesting a continuance of the hearing to Wednesday, January 27, 2015, a date that Union Counsel previously requested for the continuation of the Hearing.

As you know, there has been an unprecedented snow storm in Pennsylvania this past weekend. I live and travel from Harrisburg, Pennsylvania, where we have 30.2 inches of snow, a new one day record. My car is current under a pile of snow and my street has not been plowed. Cars in our area are stuck in the snow and the City of Harrisburg has not plowed many streets. I submit that travel to a Hearing on Monday, including travel by witnesses who work as nursing staff at a licensed nursing facility, and may have to be replaced by other staff who may have similar travel problems, is not appropriate and that recovery from the present conditions constitutes sufficient good cause for the requested continuance.

Please advise at your earliest convenience. I have requested concurrence from Union Counsel and Board Agent Joshua Rosenberg, but have not heard back from them yet. They are copied on this request by email

Respectfully submitted.

/s/ Bruce G. Baron

---

Bruce G. Baron, Esq.

cc: Lisa Leshinsky, Esq. (Union Counsel) (by email)  
Joshua D. Rosenberg, Board Agent